

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

---

RICHARD M. NAULT

Plaintiff

v.

UNITED STATES OF AMERICA,

Defendant.

---

CIVIL ACTION NO. C-04-479-PB

**ASSENTED-TO MOTION TO EXTEND TIME FOR FILING REPLY**

NOW COMES Plaintiff, Richard M. Nault, by and through his attorneys, Sheehan, Phinney, Bass + Green, P.A., and makes this Assented-to Motion to Extend Time for Filing Reply, stating in support as follows:

1. Defendant filed an Objection to Plaintiff's Motion for Summary Judgment on December 23, 2005 via ECF. Pursuant to Fed. R. Civ. Pro 6(d), (e) and L.R. 6.1, Plaintiff has until January 13, 2006 to submit his reply.
2. Plaintiff needs additional time to address the issues raised in Defendant's Objection and to properly present the necessary documents to support his position. Plaintiff requests an additional week, until January 20, 2006, to submit his reply.
3. Defendant's counsel, Stephen J. Turanchik, Esq., assents to the relief requested herein.

WHEREFORE, Plaintiff respectfully requests that this Court:

- A. Grant Plaintiff an additional week, until January 20, 2006 to submit his Reply; and
- B. Grant such other in further relief in Plaintiff's favor as may be proper and just.

Respectfully submitted,

**RICHARD M. NAULT**

By His Attorneys,

**SHEEHAN PHINNEY BASS & GREEN,  
PROFESSIONAL ASSOCIATION**

Dated: January 12, 2006

By: /s/ Robert R. Lucic  
Robert R. Lucic (No. 9062)  
Peter Beach (No. 7861)  
Michael G. Valentine (No. 16506)  
1000 Elm Street, P.O. Box 3701  
Manchester, NH 03105-3701  
(603) 627-8188  
[rlucic@sheehan.com](mailto:rlucic@sheehan.com)  
[pbeach@sheehan.com](mailto:pbeach@sheehan.com)  
[mvalentine@sheehan.com](mailto:mvalentine@sheehan.com)

**CERTIFICATION**

I hereby certify that a copy of the foregoing Assented-To Motion to Extend Time for Filing Reply was served on the following persons on this date and in the manner specified herein:

Via ECF:

Stephen J. Turanchik  
Trial Attorney, Tax Division  
U.S. Department of Justice  
P.O. Box 55  
Ben Franklin Station  
Washington, D.C. 20044

Via First Class Mail:

Thomas R. Colantuono  
United States Attorney  
55 Pleasant Street  
Concord, NH 03301

/s/ Robert R. Lucic  
Robert R. Lucic